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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MICHAEL R. AND SUSAN C. CLARK)

Plaintiffs,)

vs.)

UNITED STATES OF AMERICA, the)
DEPARTMENT OF TREASURY by its)
agency, the INTERNAL REVENUE)
SERVICE,)

Defendant.)

Case No.: CV 11-0471 RS

**STIPULATION AND ~~(PROPOSED)~~
ORDER TO EXTEND BRIEFING
DEADLINES**

Honorable Richard Seeborg
United States District Judge

Plaintiffs, MICHAEL R. AND SUSAN C. CLARK together with Defendant, the UNITED STATES OF AMERICA, DEPARTMENT OF TREASURY by its agency, the INTERNAL REVENUE SERVICE, by and through its representative, Cynthia Stier, Assistant United States Attorney, file this stipulation and proposed order to extend the briefing schedule deadlines with respect

1 to the United States' Motion for Summary Judgment, docket no. 30, by ten (10) days. As of the date of
2 filing of this proposed order and stipulation, Plaintiffs counsel is currently in trial on a separate matter
3 in the United States Tax Court. Plaintiffs counsel request additional time to adequately prepare and file
4 briefs in this case. Accordingly, Plaintiffs' Opposition brief will be due Thursday, July 5, 2012. The
5 United States' Reply brief will be due July 12, 2012. For this reason, the above-mentioned parties
6 hereby stipulate that there is good cause to extend the briefing schedule by ten (10) days.
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9 DATED this 22nd day of June, 2012.

MELINDA HAAG
United States Attorney

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11 By /s/ Cynthia Stier
12 CYNTHIA STIER, Esq.
13 Assistant United States Attorney
14 Tax Division
Attorney for Defendant

15 DATED this 22nd day of June, 2012.

16 MARTIN A. SCHAINBAUM
A Professional Law Corporation

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18 By /s/ Andrew D. Allen
19 ANDREW D. ALLEN, Esq.
20 Attorney for Plaintiff
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~~[PROPOSED]~~ ORDER

Based on the above agreement and stipulation of the parties and for good cause shown, it is hereby

ORDERED this 22nd day of June, 2012, at San Francisco, California, that the briefing schedule deadlines with respect to the United States' Motion for Summary Judgment, docket no. 30, are extended by ten (10) days. Plaintiffs' Opposition brief is due July 5, 2012. The United States' Reply brief is due July 12, 2012. The hearing on the motion is continued to JULY 26, 2012 at 1:30 p.m

DATED: 6/22/12



Honorable RICHARD SEEBORG
United States District Judge